August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 20250
Washington DC 20250

Reference: National Organic Program, Sunset Review, 7 CFR #205.602 (Docket Number TM-04-07) Non-synthetic substances prohibited for use in organic crop production -- Sodium Nitrate (g) Sodium nitrate- unless use is restricted to no more than 20% of the crop's total nitrogen requirement; use in spirulina production is unrestricted until October 21, 2005

Position: We urge you to continue to allow natural Sodium Nitrate as an organic crop production input at the present restricted input levels

Reason: Natural Sodium Nitrate is a naturally occurring nitrogen rock mined from the earth. Sodium nitrate is in abundant supply in Chile and Kazakhstan. The organic nitrogen for crop production is available from the Sodium Nitrate in a unique way in that it allows organic producers to get an all natural, available form of nitrogen in the plants in the early part of the growing season when other organic nitrogen is not available from cold soils.

The amount of natural Sodium Nitrate that organic growers use is a minute portion of nitrogen needed for the production of organic crops. Yet we can use up to 20% of the necessary nitrogen for crop production, our use rate has been very effective for crop production. It is the right organic nitrogen product to combine with carbon and other plant nutrients at the right time.

Thank you

Steve Ewald,
Ewald Farms, Inc.

August 15, 2005

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Director, Program Administration
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Reference: Review of Fish Fertilizer with allowed synthetic substances
Point 7 Liquid Fish Products #205.601

Position: We urge you to continue to allow Fish Hydrolysate and Fish Emulsion (lowered to a pH of 3.5 with phosphoric acid or sulfuric acid as a stabilizer or pickling agent) as an approved input for organic crops.

Reason: Fish is the superior organic input fertilizer as it can be produced from 100% wild fish from the great lakes or from the oceans. However, fish needs to be stabilized or pickled to a pH of 3.5 with acid or it will putrefy. Phosphoric acid allows fish hydrolysate to be produced at an economical cost. As growers we can then afford to us fish hydrolysate for crop production. Phosphoric acid is an essential ingredient when producing fish hydrolysate from wild fish scraps.

Fish hydrolysate cannot be stabilized without lowering the pH to 3.5. Using feed grade phosphoric acid is nutritionally safe. Feed grade phosphoric acid is produced from rock phosphate, a natural mined material from our earth.

Thank you

Steve Ewald,
Ewald Farms, Inc.